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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

10 **Susan Hoy**, as Guardian Ad Litem for  
11 **J.M. and I.M.**, minors,

Case No.: 2:20-cv-00103-CDS-VCF

12 Plaintiffs,  
13 vs.

14 **Andrea Hernandez; Waldo**  
15 **Hernandez; Lisa Brochu**; Kim Kallas;  
16 Lisa Ruiz-Lee; Paula Hammack; DOE  
17 Individuals I-X; ROE Clark County  
18 Department of Family Services  
19 Employees XI-XX, individually and in  
20 their official capacities; County of Clark,  
a political subdivision of the State of  
Nevada; and ZOE Corporations XXI-XXX,

**Stipulation and [Proposed] Order to  
Extend Deadline for the Parties to  
Submit the Joint Pretrial Order**

**(3rd Request)**

21 Defendants.

22 **Clark County**,

23 Cross-Claimant,

24 vs.

25 **Andrea Hernandez; Waldo**  
26 **Hernandez; MOES 1-10; and MOE**  
27 **Corporations 11-20**,

28 Cross-Defendants.



1 WHEREAS Plaintiff has reached settlements with Defendants Lisa Brochu and  
2 Clark County; and

3 WHEREAS the parties continue to require additional time to finalize said  
4 settlements, including the petitions to approve the compromise of the minors'  
5 claims;

6 IT IS HEREBY STIPULATED by the parties hereto, by and through their counsel of  
7 record, that the time to file their Joint Pretrial Order, be extended thirty (30) days.

8 This is the parties' third request for an extension and this stipulation is submitted  
9 in good faith without the purpose of undue delay.

10 Dated this 3<sup>rd</sup> day of January, 2024.

11 H&P LAW

12 /s/ Marjorie Hauf

13 Marjorie Hauf, Esq.

14 Nevada Bar No. 8111

15 Cara Xidis, Esq.

16 Nevada Bar No. 11743

17 Attorneys for Plaintiffs

Dated this 3<sup>rd</sup> day of January, 2024.

WILEY PETERSEN

/s/ Jonathan Blum

Jonathan D. Blum, Esq.

Nevada Bar No.: 9515

Attorney for Defendant,

Lisa Brochu

17 Dated this 3<sup>rd</sup> day of January, 2024.

18 KEATING LAW GROUP

Dated this 3<sup>rd</sup> day of January, 2024.

OLSON CANNON GORMLEY & STOBERSKI

19 /s/ Bryce Buckwalter

20 Bryce B. Buckwalter, Esq.

21 Nevada Bar No.: 7626

22 Attorney for Defendants,

Andrea and Waldo Hernandez

/s/ Felicia Galati

Felicia Galati, Esq.

Nevada Bar No.: 7341

Attorney for Defendant,

County of Clark

23 IT IS HEREBY ORDERED that the joint pretrial order is due  
24 February 2, 2024.

25 IT IS SO ORDERED.



26 Cam Ferenbach  
United States Magistrate Judge

27 DATED 1-4-2024